

# **LOUISIANA STATE CONFERENCE NAACP**

## **Exhibit B**

### **I.B. Declaration**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

Case No. 69-cv-14430

UNITED STATES OF AMERICA,

Plaintiff,

v.

CATAHOULA PARISH SCHOOL BOARD,  
ET AL,

Defendants.

**DECLARATION OF I.B.**

I, I.B., do hereby state as follows:

1. I make this Declaration based on my own personal knowledge and am competent to testify concerning the matters set forth below.
2. I am 17 years old and currently a student at Block High School in the 11th grade.
3. I have attended schools in the Catahoula Parish school district for all my years of schooling and previously attended Jonesville Junior High and Jonesville Elementary.
4. From the outside looking in, Block High might not seem too bad but that is because the school keeps the front entrance of Building A, the administrative building, clean. Students do not take classes in Building A.
5. Students also no longer take classes in Building B. About two years ago, Building B was shut down due to a black mold health hazard. To date, that building has not been

reopened.

6. Building C, the sole building where students take classes, has also been in poor condition in recent years. In particular, the roof was damaged so that when it rained water leaked into the building. The walls and floor were also dirty.

7. On multiple occasions, I asked my teachers if anything could be done to remedy these conditions but they only laughed about it or said the school was handling it. Nothing was done to address these conditions until a few months ago.

8. Currently, students at Block do not have an accessible science lab since our only science lab is located in Building B. The bleachers in the gym are also damaged so that if someone sits on one end of the row, the other end goes up. Students at Block also are not guaranteed a locker. Instead, we were told that if we wanted a locker we would have to rent one for \$11. To my knowledge, hardly any students rent them out and they remain locked up.

9. In December 2018, Building A's water fountains were fixed and doors were placed in the bathroom stalls. In February 2019, there was remodeling done in Building C to the roof, boy's bathroom, and floor. It seems like the school is now trying to hurry up and fix things in response to the recent news reports about Block High School.

10. The school also just hired a new teacher to teach U.S. History, Physics, and English on March 4, 2019. Prior to the new teacher arriving, those classes were taught by an athletic coach.

11. This year alone, we have had at least five substitute teachers who each taught classes for longer than one week. In some of these classes, rather than teach, these substitutes would just tell students to do work for our other classes on the computers.

12. To my knowledge, Block High School does not offer any honors, Advanced Placement, or IB level classes.

13. I do not feel like I am getting a quality education at Block High School because most of the work I do is on the computer and I cannot confirm whether I am actually learning. Many of my teachers are unable to tell me if I am doing my work correctly since they are either substitutes or fresh out of college. For instance, my Spanish teacher did not know any Spanish. I fell behind in the class and had to ask another student to help me. In my Customer Service class, I asked the teacher a question about an online assignment, but she told me that she honestly did not know that much about the topic and that she was just giving me the work that the school assigned.

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14. I also do not feel like this school has prepared me for college. In fact, I know of many students who graduated from Block High and then dropped out of college because they were not prepared.


15. Many students have been transferring out of Block High School to Harrisonburg High School. A few friends of mine have transferred because they are not learning anything at Block and feel like Harrisonburg is a better school. A few students leave because they say Block is a health hazard.

16. Harrisonburg has a reputation in Catahoula Parish for being a better school for academics. Some students at Harrisonburg have referred to students in Jonesville as “savages” and “animals.”

17. While students have the option to transfer schools in Catahoula Parish, I have not transferred out of Block High School because I do not want to give up on my school.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: March 5, 2019

  
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I.B.

### PARENTAL CONSENT AND DECLARATION

I, SonTasha M. Barber, do hereby state that I am the natural parent and/or legal guardian of I.B. and declare as follows:

1. I am entitled to the full control and custody of I.B. and am responsible for his care, custody and control.
2. I acknowledge that I.B. voluntarily elects to execute this declaration, and I consent to his execution of same.
3. I also declare that I am aware of and/or have witnessed the circumstances described by I.B. in this declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: March 5, 2019

Signature: SonTasha M. Barber  
Name: